Foreword

The Department of Environment and Heritage Protection (EHP) protects the health of Queensland’s environment, landscapes and waterways, and acts as a strong environmental regulator which supports the sustainable long-term economic development of the state.

In fulfilling this role, the department is committed to managing and monitoring potential environmental risks through a targeted and transparent approach to compliance.

The development of the CSG/LNG Compliance Plan 2012-13 is in response to the ongoing expansion of the coal seam gas (CSG) to liquefied natural gas (LNG) industry in Queensland and the department’s commitment to ensuring that the environmental impacts of this industry are appropriately and effectively managed.

The implementation of this compliance plan is within the robust regulatory and legislative framework that has been established to manage the environmental impacts of the CSG to LNG industry.

This framework includes ensuring that operators understand their environmental obligations, encouraging industry to voluntarily comply with their environmental obligations, as well as implementing strong compliance and enforcement activities which act as a deterrent to non-compliance.

In 2012-13 the department’s compliance focus for the CSG to LNG industry will be on pipeline construction and water management. This is in line with the industry’s construction, operational and rehabilitation phase. It also includes a new emphasis on the appropriate management of CSG waste at waste disposal facilities, as well as annual returns for environmental authorities.

The department’s approach to compliance underpins EHP’s goal to be an agency against which other Australian states benchmark themselves for the emerging CSG to LNG industry.

The plan provides industry, and the general community, with access to compliance information. It also underlines transparency and consistency in the department’s decision making process for compliance and enforcement activities.

In addition, this compliance plan for the CSG to LNG industry provides assurance to the community that appropriate environmental management of this expanding industry will protect Queensland’s environment, land and waterways.

Andrew Chesterman
Director-General
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**Introduction**

The coal seam gas (CSG) to liquefied natural gas (LNG) industry in Queensland is continuing to rapidly expand. To ensure the environmental impacts of the growing industry are appropriately and effectively managed, the Department of Environment and Heritage Protection (EHP) has developed a robust regulatory and legislative framework.

The department’s approach is to encourage voluntary compliance with environmental obligations. It does this by actively engaging with companies and individuals subject to environmental regulation through activities such as education and awareness-raising, as well as by conducting inspections. These activities are complemented by compliance and enforcement activities designed to act as a deterrent to legislative non-compliance.

The CSG/LNG Compliance Plan outlines how the government ensures CSG to LNG companies comply with their regulatory and legislative obligations.

It provides an overview of the strategies, key focus areas and priorities, legislative scope and industry activities to be targeted for compliance in 2012-13. The specific compliance inspections to be undertaken by departmental staff, including frequency and expected outcomes, are also included.

The plan has been developed in conjunction with the department’s Annual Compliance Plan, Compliance Strategy and Enforcement Guidelines. Through it, the department aims to:

- ensure industry operators understand their obligations under Queensland law
- encourage industry operators to voluntarily comply with these obligations
- work with government, business, industry and the community to improve performance
- take a consistent approach to non-compliance and to deter further non-compliance
- ensure public and stakeholder confidence in the transparency and effectiveness of the regulatory framework
- respond to and investigate community concerns and intelligence received regarding industry operators and activities.

**Issues and focus areas**

**Compliance issues**

Each year there are ongoing or new and emerging issues in the CSG to LNG industry to be addressed when it comes to regulation and compliance. For 2012-13, the department has identified the following broad compliance issues as a priority:

- management of CSG dams and residual salt
- management and monitoring of CSG impacts on bores, aquifers and springs
- management and correct disposal of waste products including CSG water
- rehabilitation of decommissioned CSG evaporation dams
- sediment and erosion control at CSG and LNG development sites
- management and monitoring of LNG development impacts on marine values
- acid sulphate soil management relating to the construction of CSG and LNG infrastructure and
- providing better understanding of hydraulic stimulation and stimulation flowback risks and practices.

**Focus areas**

Within these issues, there are specific activities to be targeted for compliance in 2012-13. These areas have been identified after analysis of 2011 industry development and incident, complaint and compliance data. They include:

- management and monitoring of impacts of groundwater extraction on bores, aquifers and springs
- production and management of CSG water
- fracking activities
- general level 1 and level 2 activities and
- construction of pipelines and LNG facilities.

Pipeline construction and water management in particular are a focus. This is due to the construction, operational and rehabilitation phases of the CSG field component being established through the project areas to meet the ongoing demand for the establishment of LNG facilities in Gladstone.

Pipeline construction
The construction phase of pipelines involves the clearing of vegetation in order to construct infrastructure. Vegetation clearing has a number of environmental and other impacts, including erosion and sediment issues and land access issues. There is also a need to ensure unauthorised clearing of protected vegetation is prevented.

As a result the department has set commitments to ensure inspections of the construction phase of CSG to LNG activities—and also of pipeline construction—are undertaken, with particular focus on Curtis Island and The Narrows.

Water management
The department has a strong legislative framework in place to ensure the adequate management of water at all stages of the CSG-LNG process.

Groundwater impacts are monitored, and the monitoring techniques are subject to inspection. Companies are required to submit baseline assessment plans and underground water impact reports, as a requirement of Chapter 3 of the Water Act 2000. Further, companies are required to obtain beneficial use approvals to be able to recycle CSG waste water for beneficial use.

With particular emphasis on beneficial use, CSG companies have indicated that they will manage associated water using storage and treatment dams, injection, discharge to surface waters and transportation to waste facilities.

Desktop inspections undertaken by EHP staff will review all documentation submitted to the department regarding water management, and site inspections will be conducted where necessary to ensure compliance.

Further, the introduction of waste stream tracking as a commitment in the 2012-13 Compliance Plan will ensure that all areas of water management are complied with.
Legislative scope

The department’s compliance activities are designed to ensure industry adheres to the requirements of the following legislation:

- Environmental Protection Act 1994
- Water Act 2000 (limited to Chapter 3 only)
- Waste Reduction and Recycling Act 2011
- Coastal Protection and Management Act 1995
- Nature Conservation Act 1992
- Environmental Protection and Biodiversity Conservation Act 1999 (Commonwealth)

Environmental Protection Act 1994

The Environmental Protection Act 1994 (EP Act) regulates the environmental impacts of the CSG to LNG industry through statutory requirements and a licensing framework. All CSG and LNG operators are subject to rigorous environmental assessment processes and must be issued an environmental authority (EA) from EHP before commencing operations. EA holders are required to operate under strict environmental conditions to prevent environmental harm being caused or threatened.

CSG and LNG activities are divided into two categories under the EP Act (under Chapter 5A), each with different obligations:

- Level 1 activities have higher environmental risk associated with the activity. Companies undertaking such activities are required to develop an Environmental Management Plan (EMP) which identifies the potential impacts on the surrounding environment and how these will be managed to complement the EA application process. Level 1 activities (relevant to CSG and LNG) are outlined below.

<table>
<thead>
<tr>
<th>Level 1 Chapter 5A activities**</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. A petroleum activity that is likely to have a significant impact on a category A or B environmentally sensitive area.</td>
</tr>
<tr>
<td>4. Extending an existing pipeline by more than 150 kilometres (km) under a petroleum authority.</td>
</tr>
<tr>
<td>5. Constructing a new pipeline of more than 150 km under a petroleum authority.</td>
</tr>
<tr>
<td>6. A petroleum activity carried out on a site containing a high hazard dam or a significant hazard dam.</td>
</tr>
<tr>
<td>7. A petroleum activity involving injection of a waste fluid into a natural underground reservoir or aquifer.</td>
</tr>
</tbody>
</table>

**Located in Schedule 5 – Environmental Protection Regulation 2008

- Level 2 activities have lower environmental risk associated with the activity, and do not fall into the above category.

Water Act 2000 (limited to Chapter 3 only)

Chapter 3 of the Water Act 2000 provides for the management of impacts on underground water caused by the extraction of groundwater by CSG activities.

The Act provides a framework for managing the impacts of petroleum tenure holders on underground water and natural springs. This framework is specifically designed to progressively build a comprehensive understanding of the impacts of petroleum activities on groundwater and natural springs, and to facilitate the implementation of make good arrangements for water supply bores.

The main requirements of Chapter 3 for petroleum tenure holders are:

- Preparing baseline assessment plans (BAPs).
  - BAPs are to be prepared by all petroleum tenure holders to set out a strategy for undertaking baseline
assessments of all water bores in a tenure area.

- The requirements for a BAP include identifying priority areas for undertaking baseline assessments across the area of the tenure.
- The plan also needs to identify any water bores for which the petroleum tenure holder has already undertaken a baseline assessment or equivalent and the date by which the petroleum tenure holder will have completed all of the baseline assessments in each priority area.

- Preparing underground water impact reports (UWIRs).
  - The purpose of an UWIR is to model, make predictions and manage the impacts of extraction of underground water by petroleum tenure holders (including CSG tenure holders).
  - UWIRs establish responsibilities for petroleum tenure holders and ensure measures and programs are in place to respond to impacts on underground water.
  - UWIRs also establish the requirements for petroleum tenure holders to make good any impairment of water supply bores and to mitigate impacts on natural springs.
  - A UWIR must be prepared by the Queensland Water Commission for any declared cumulative management area or by the relevant petroleum tenure holder for any other area. In accordance with the Water Act 2000 the UWIR must contain certain information, including a spring impact management strategy and a water monitoring strategy.

- Carrying out the requirements outlined in approved BAPs and UWIRs.

**Waste Reduction and Recycling Act 2011**

The Waste Reduction and Recycling Act 2011 sets out a framework for prioritising waste management practices to achieve the best environmental outcome.

The hierarchy of waste and resource management practices is as follows:

- Avoid unnecessary resource consumption.
- Reduce waste generation and disposal.
- Re-use waste resources without further manufacturing.
- Recycle waste resources to make the same or different products.
- Recover waste resources, including the recovery of energy.
- Treat waste before disposal, including reduction of the hazardous nature or waste.
- Dispose of waste only if there is no other viable alternative.

Waste is defined in the EP Act as including anything that is left over, or an unwanted by-product, from an industrial, commercial, domestic or other activity; or surplus to the industrial, commercial, domestic or other activity generating the waste. Waste can be a gas, liquid, solid or energy, or a combination of any of those things.

The extraction of CSG results in the production of CSG water, which typically contains significant concentrations of salts, has a high sodium adsorption ratio (SAR) and may contain other contaminants that have the potential to cause environmental harm if released to land or water through inappropriate management. CSG water is deemed to be waste.

One way to minimise the amount of waste being sent for final disposal is to beneficially reuse the waste as a resource. A beneficial use approval (BUA) for a waste changes the status of the material from a waste to a resource that is to be used for a beneficial purpose. The holder of a BUA is obliged (through approval conditions) to manage the resource in a way that minimises the risk of unlawful environmental harm.

Beneficial uses of CSG water covered under general approval for the beneficial use of CSG water include:

- irrigation
- domestic purposes
- livestock drinking water
- aquaculture and human consumption of aquatic foods
- dust suppression
Cancellation of revegetation.

Because BUAs are such an important part of the CSG to LNG industry, continual checking to ensure standards are being complied with is of high importance.

**Coastal Protection and Management Act 1995**

The **Coastal Protection and Management Act 1995** (CPMA) provides for the protection, conservation, rehabilitation and management of the coast including its resources and biological diversity.

LNG operations include dredge management plan conditions, tidal works approvals and potential works within coastal management districts which all require approval under the CPMA and need to be monitored to ensure compliance.

A major part of the LNG industry is located on Curtis Island, near Gladstone.

**Nature Conservation Act 1992**

The **Nature Conservation Act 1992** (NCA) regulates the environmental impacts of the CSG to LNG industry through the use of industry clearing permits.

The NCA protects native plants indigenous to Australia (protected plants) and regulates the clearing of individual protected plants. A clearing permit is required to clear protected plants unless an exemption applies. In general, exemptions will only apply to the clearing of least concern protected plant species. Clearing of endangered, vulnerable, rare or near threatened protected plants will require a clearing permit. Clearing permit applications received by EHP will be assessed on a case-by-case basis and approvals will be subject to conditions.

In instances where a Species Management Program has been approved this may give CSG to LNG operators the ability to clear native flora and fauna.

**Environmental Protection and Biodiversity Conservation Act 1999 (Commonwealth)**

The **Environmental Protection and Biodiversity Conservation Act 1999** is Commonwealth legislation and has been included purely for noting purposes—there are no compliance activities measured against it under this CSG/LNG Compliance Plan.

This piece of Commonwealth legislation is effective when an infrastructure project has the potential to impact on matters of national environmental significance, or where alternatively the project may be deemed to be a ‘controlled action’.

Both matters of national environmental significance and controlled actions require assessment and approval under this legislation.
Compliance activities 2012-13

The department’s compliance inspections in 2012-13 will centre on the activities outlined below.

In addition to planned inspections, unscheduled inspections may be conducted as a result of information received from the community, landholders, industry operators and where departmental officers consider that additional inspections need to occur. The department investigates and responds to all complaints and enquiries lodged regarding the CSG to LNG industry.

Where non-compliance is identified, companies may be asked to provide further information to assess their level of non-compliance or bring them into compliance, and the department may take enforcement action consistent with its Enforcement Guidelines. These actions may include issuing environmental protection orders, environmental evaluations, transitional environmental programs, warning notices or penalty infringement notices (fines). In more serious cases, prosecution may be more appropriate.

Level 1 activities

CSG activities are classified as either level 1 or level 2, based on the risk of environmental harm.

Level 1 activities have higher environmental risks associated with the activity and require an environmental management plan that identifies the potential impacts on the surrounding environment and how these risks will be managed. Applications for level 1 CSG projects are required to be publically notified and may be subject to the environmental impact statement process, which includes an extensive public consultation period.

Inspections of level 1 activities may include:

- assessing disturbance to land
- water management and releases
- dam management including hazard assessment
- reporting and rehabilitation of completed activities
- chemical storage
- air emissions from large plant
- sewage management at large accommodation camps
- waste management and disposal
- construction of accommodation camps, gas and water processing facilities, pipelines etc.

Level 2 activities

Level 2 activities have a low-risk of causing serious environmental harm and require a non-code compliant environmental authority.

Inspections of level 2 activities may include:

- well construction and completion reports
- groundwater sampling techniques
- erosion and sediment control
- rehabilitation of completed activities.

Construction phase of CSG-LNG activities

Construction phases of major projects typically create a number of specific environmental risks which do not exist during operational phases, such as sediment and erosion control and acid sulphate soil management. The specific LNG developments are located on an island within the Great Barrier Reef World Heritage Area in association with mainland support facilities. Access to and run-off from the construction site and support facilities presents risks for marine values.

Inspections of the construction phase of LNG activities and facilities may include:

- assessment of compliance with the marine species monitoring program
- assessment with the requirements of relevant environmental authorities and development approvals
monitoring of The Narrows dredging and crossing activities

other activities associated with the construction of activities and facilities relating to LNG.

Curtis Island and the pipelines crossing of The Narrows will be of particular focus.

Bore monitoring
In 2011, measurements were taken from 300 bores. These initial first year measurements will provide baseline data for verification of potential groundwater impacts.

These 300 bores will be monitored again in 2012-13, and as the data is gathered and analysed it will provide the opportunity to assess any groundwater impacts.

Groundwater monitoring
To ensure confidence in the accuracy of CSG company groundwater monitoring data, the department will conduct onsite inspections of companies’ groundwater monitoring techniques, including measuring and sampling techniques. The department will also take duplicate groundwater samples for independent analysis and conduct desktop inspections on CSG monitoring procedures.

Chapter 3 Water Act 2000 activities
Desktop inspections of BAPs and UWIRs will be conducted by the department when they are submitted. The department will monitor compliance of petroleum tenure holders' actions in submitting and complying with timeframes attached to BAPs and UWIRs. If petroleum tenure holders become non-compliant the department will take appropriate compliance action.

Monitoring hydraulic stimulation, including use of fraccing chemicals
Ensuring fraccing activities are managed, and CSG operators are complying with the regulatory framework, is of extreme importance to the department due to the potential impacts to the environment, including water resources. The promotion of vigilance and awareness is important in educating the CSG industry and the public as to the fraccing requirements and monitoring regimes currently in place.

Beneficial use approval (BUA) monitoring
BUAs provide companies with the ability to recycle CSG waste water for beneficial use. The use of CSG water requires a general approval for associated water. A general approval is an approval for a resource of which everyone has the benefit. For instance the beneficial uses of CSG waste water include aquaculture and human consumption of aquatic foods, coal washing, dust suppression, industrial use, washing down and cleaning of flood-affected infrastructure, irrigation and livestock watering.

Water that is reconditioned under a BUA must meet specified water quality criteria, in addition to EHP assessing the level of compliance with the conditions imposed on the BUA and environmental impacts.

Regulated and evaporated dams
The construction, operation and management of CSG dams provide companies with a place to store and manage waste water generated by CSG operations. Stringent conditions regulated by the conditions of the environmental authority in relation to how dams are to be designed, constructed, operated and commissioned, and inspections occur to ensure compliance with the conditions.

In all but exceptional circumstances, evaporation dams have been banned for CSG water, and existing dams will either be converted to other uses or decommissioned. If an evaporation dam is proposed, the CSG operator must demonstrate that there is no feasible alternative to managing the CSG water.

Waste stream tracking
CSG waste generally includes associated water, oily water and drilling fluid. CSG companies must comply with the EP Act and the government’s associated water management policy which outlines the preferred CSG water management strategies.

The policy does not include management strategies for third party licensed waste disposal companies which receive associated water, oily water and drilling fluids for storage, treatment or disposal.
Annual returns for environmental authorities

An annual return describes environmental management activities at the site for the previous 12 months. The annual return is provided to the department and must address:

- the extent to which conditions of the EA have been met
- actions taken in response to environmental incidents
- other initiatives undertaken
- disturbance and rehabilitation undertaken.

Under the EP Act, if the holder of an EA fails to comply with an annual notice by not submitting a completed annual return, the department may suspend or cancel the EA. Suspension or cancellation of the EA would mean that activities authorised under the terms of the EA will have to cease.
# Schedule of compliance inspections 2012-13

The following table lists the specific compliance inspections to be undertaken by departmental staff in 2012-13, including the number of activities and the expected outcomes. Discretion is given to environmental officers/departmental staff to conduct inspections outside of what is included. Unscheduled inspections will also be conducted throughout the year.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Assessing</th>
<th>Commitment</th>
<th>Expected Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level 1 activities</td>
<td>Disturbance to land, water management and releases, dam management including hazard assessment and reporting, rehabilitation of completed activities.</td>
<td>20 Inspections</td>
<td>Non-compliance detected and corrected. Increased compliance with EA conditions. CSG operators undertaking environmentally safe practices.</td>
</tr>
<tr>
<td>Level 2 activities</td>
<td>Well construction and completion reports, groundwater sampling techniques, erosion and sediment control.</td>
<td>15 Inspections</td>
<td>Emerging risks are identified and targeted through proactive compliance programs.</td>
</tr>
<tr>
<td>Construction phase of CSG to LNG activities</td>
<td>Assessment of compliance with environmental authorities, development approvals and the marine species monitoring program, with a particular focus of facilities on Curtis Island.</td>
<td>36 Inspections</td>
<td></td>
</tr>
<tr>
<td>Pipeline construction</td>
<td>Pipeline construction to ensure compliance with environmental authorities and development approval conditions, with a particular focus on The Narrows.</td>
<td>14 Inspections</td>
<td></td>
</tr>
<tr>
<td>Bore monitoring program</td>
<td>Potential groundwater impacts and comparing with 2011 data.</td>
<td>300 Inspections</td>
<td>Increased accuracy of groundwater modelling and understanding of aquifer interconnectivity and cumulative impacts. Early identification of impact to groundwater supplies. Non-compliance detected and corrected. Increased compliance with reporting requirements. Inadequate groundwater sampling methods identified and corrected.</td>
</tr>
<tr>
<td>Groundwater monitoring</td>
<td>Monitoring measuring and sampling techniques and desktop audits on CSG monitoring procedures.</td>
<td>Desk top inspections on CSG monitoring procedures. Site inspections of monitoring techniques where necessary.</td>
<td></td>
</tr>
<tr>
<td>Assessing BAPs and UWIRS</td>
<td>Compliance with content and timeframe requirements.</td>
<td>Desktop inspections on all BAPs and UWIRs submitted. Site inspections conducted where necessary.</td>
<td></td>
</tr>
<tr>
<td>Monitoring hydraulic stimulation, including use of fracing chemicals</td>
<td>Desktop inspections will assess all fracing risk assessments. This will be supported by site visits where necessary, to sample feedwater, audit chemicals on site, sample frac fluid, audit flow back and post-frac operations.</td>
<td>Desktop inspections of all fracing risk assessments. Site inspections conducted where necessary.</td>
<td>Tenure holders’ fracing risk assessments independently assessed. Increased compliance with EA conditions. Increased awareness and/or vigilance of fracing requirements</td>
</tr>
</tbody>
</table>
## Monitoring beneficial use approvals (BUAs)

<table>
<thead>
<tr>
<th>Activity</th>
<th>Description</th>
<th>Inspections</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulated dams</td>
<td>Check structural integrity, leak detection, compliance with conditions.</td>
<td>3 Inspections</td>
<td>Storage facilities operated by CSG companies or waste disposal facilities inadequately constructed to store or treat CSG water identified and corrected.</td>
</tr>
<tr>
<td>Evaporation dams</td>
<td>Check compliance against transitional environmental program (TEPs) in the phasing out process.</td>
<td>(1 inspection may incorporate multiple dams on one site)</td>
<td>Inefficiencies in water quality monitoring data identified and corrected.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Risk of impact to water supplies and environment is minimised.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Harm to high-value conservation areas, namely Category A, B and/or C environmentally sensitive areas caused by BUAs minimised.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Increased compliance with EA conditions, TEPs and reporting requirements.</td>
</tr>
</tbody>
</table>

## Dams – regulated and evaporation

<table>
<thead>
<tr>
<th>Activity</th>
<th>Description</th>
<th>Inspections</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulated dams</td>
<td>Check structural integrity, leak detection, compliance with conditions.</td>
<td>3 Inspections</td>
<td>Storage facilities operated by CSG companies or waste disposal facilities inadequately constructed to store or treat CSG water identified and corrected.</td>
</tr>
<tr>
<td>Evaporation dams</td>
<td>Check compliance against transitional environmental program (TEPs) in the phasing out process.</td>
<td>(1 inspection may incorporate multiple dams on one site)</td>
<td>Inefficiencies in water quality monitoring data identified and corrected.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Risk of impact to water supplies and environment is minimised.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Harm to high-value conservation areas, namely Category A, B and/or C environmentally sensitive areas caused by BUAs minimised.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Increased compliance with EA conditions, TEPs and reporting requirements.</td>
</tr>
</tbody>
</table>

## Waste stream tracking

<table>
<thead>
<tr>
<th>Activity</th>
<th>Description</th>
<th>Inspections</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accurate completion of waste tracking certificates and appropriate management of CSG waste at the waste disposal facilities.</td>
<td>Desktop inspections of waste tracking certificates. Site inspections conducted where necessary.</td>
<td>Non-compliance detected and corrected through proactive compliance program. Increased legislative compliance with the management of regulated waste derived from CSG activities.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Improvements in waste management through increased awareness and education.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Risk of environmental harm resulting from mismanagement of CSG waste reduced.</td>
</tr>
</tbody>
</table>

## Annual returns for environmental authorities

<table>
<thead>
<tr>
<th>Activity</th>
<th>Description</th>
<th>Inspections</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submission of the following required criteria with the annual return:</td>
<td>Desktop inspections of all annual returns. Desktop inspections of specifically requested documents.</td>
<td>Annual Returns provided by CSG operators are independently assessed and audited.</td>
<td>Emerging risks and repeat issues are identified and targeted through proactive compliance programs.</td>
</tr>
<tr>
<td>• Complaints and compliance matters</td>
<td></td>
<td></td>
<td>Increased knowledge of potential environmental impacts.</td>
</tr>
<tr>
<td>• Hydraulic fracturing activities</td>
<td></td>
<td></td>
<td>Increased environmental performance of CSG operators.</td>
</tr>
<tr>
<td>• Regulated structures and dams, and</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reactive Inspections</td>
<td>Assess and respond to information received from the community, landholders and industry operators.</td>
<td>Unscheduled inspections conducted where necessary.</td>
<td>Environmental complaints and incidents are effectively managed and environmental harm is minimised.</td>
</tr>
<tr>
<td>----------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>

- Disturbance to land
- Groundwater monitoring program
- Third party audit
- Release reduction strategy for authorised discharges to waters, and
- Operational fluid injection.